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FILED
HARRISBURG

AUG 31 2001

MARY E. D'ANDREA, CLERK
Per. *[Signature]*
DEPUTY CLERK

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

PAUL TURPIN, :
Petitioner :
v. : Civil No. 1:CV-01-0168
IMMIGRATION AND NATURALIZATION, :
SERVICE :
Respondent :

NOTICE TO THE COURT

On August 14, 2001, Respondent Immigration and Naturalization Service (INS) moved the Court to dismiss the petition for mootness because Petitioner Paul Turpin was to be released from INS custody. On August 31, 2001, the INS informed the undersigned counsel that Mr. Turpin was released from INS custody on August 30, 2001. Attached are the relevant documents effectuating Mr. Turpin's release.

Respectfully submitted,

MARTIN C. CARLSON
United States Attorney

[Signature: Dulce Donovan]
DULCE DONOVAN
Assistant U.S. Attorney
Federal Building
228 Walnut Street
Post Office Box 11754
Harrisburg, PA 17108

Dated: August 31, 2001

Aug 29 01 02:12p United States

(570) 775 1548

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08/09/01 13:02 FAX 202 353

HQOPS DET&REMOVAL

001



U.S. Department of Justice
Immigration and Naturalization Service

HQPDU
801 I Street NW
Washington, DC 20536

A12 355 636

Paul Turpin
Pike County Jail
Philadelphia District Office
1600 Callowhill Street
Philadelphia, PA 19130

Release Notification

You are currently detained in the custody of the Immigration and Naturalization Service (INS). You have been ordered removed from the United States. Your removal does not appear reasonably foreseeable at this time.

Pursuant to the United States Supreme Court decisions in *Zadvydas v. Davis* and *Ashcroft v. Ma*, the INS has concluded that you will be released from INS custody pending your removal from the United States. This release does not effect your removal order and does not constitute an admission to the United States.

Your release will be subject to certain written conditions that will be provided to you shortly, and by which you must abide.

Please provide any additional information regarding potential sponsoring family members or non-governmental organizations that may be willing to assist you upon release.

It is particularly important that you keep the INS advised of your address at all times. We will continue to make efforts to obtain your travel document that will allow the United States government to carry out your removal pursuant to your order of deportation, exclusion, or removal. You are required by law to cooperate in that effort. If we are successful in obtaining those documents, you will be required to surrender to the INS for removal. You will, at that time, be given an opportunity to prepare for an orderly departure.

Signature of HQPDU Director/Designated Representative

8/09/01

Date

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A12 355 636, Paul Turpin

PROOF OF SERVICE

(1) Personal Service (Officer to complete both (a) and (b) below.)

(a) I Joel T McKelton ASD
Name of INS Officer Title
 certify that I served Paul Turpin with a copy of
Name of detainee
 this document at Pike County Jail on 8-14-01 at 1320
Institution Date Time

(b) I certify that I served the custodian _____
Name of Official
 _____, at _____, on _____
Title Institution
 _____ with a copy of this document.
Date

OR

(2) Service by certified mail, return receipt. (Attach copy of receipt)

I _____, _____, certify _____
Name of INS Officer Title
 that I served _____ and the custodian _____
Name of detainee Name of Official
 with a copy of this document by certified mail at _____ on _____
Institution Date

() cc: Attorney of Record or Designated Representative
 () cc: A-File

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United States

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Request for Release From Detention

Name: Turpin, Paul Paul
 Last First Middle
 Alien Number: A 62 355 636 Detention Location: Pike

Immigration and Naturalization Service:

Pursuant to interpretation of the opinion of the Supreme Court of the United States of America in the case Zadvydas v. Davis, I request release from the custody of the Attorney General, in that I have been ordered removed/deported from the United States by an Immigration Judge (or in another lawful manner), but due to circumstances beyond my control, my removal/deportation cannot be effected in the reasonably foreseeable future, due to an absence of a formal repatriation agreement between my country of citizenship and the United States, or due to the fact that my country of citizenship has not or will not issue identity and travel documents necessary for my departure.

The following additional information is provided:

1. I am a citizen of: Guyana
 Country of Citizenship
2. I have / have not applied for a travel document.
 Date request submitted _____
4. My birth certificate and passport (valid or expired) are in the possession of:

 Name Address
I do not have one

 Phone Number
5. If released from custody, I plan to reside at the following location:
53 Chauncey St. Brooklyn, NY.
 Address

Under penalty of law, I certify that the foregoing information provided by me herein is true.

Turpin Paul Frederick
 Last Name First Name Middle Name
Paul J. 8-14-01
 Signature Date

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United States

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U.S. Department of Justice
Immigration and Naturalization Service

Order of Supervision

File No: A 12 355 636

Date: August 14, 2001

Name: TURPIN, PaulOn 5/10/99, you were ordered:
(Date of final order)

- ☐ Excluded or deported pursuant to proceedings commenced prior to April 1, 1997.
☒ Removed pursuant to proceedings commenced on or after April 1, 1997.

Because the Service has not effected your deportation or removal during the period prescribed by law, it is ordered that you be placed under supervision and permitted to be at large under the following conditions:

- ☒ That you appear in person at the time and place specified, upon each and every request of the Service, for identification and for deportation or removal.
- ☒ That upon request of the Service, you appear for medical or psychiatric examination at the expense of the United States Government.
- ☒ That you provide information under oath about your nationality, circumstances, habits, associations, and activities and such other information as the Service considers appropriate.
- ☒ That you do not travel outside the state of New York for more than 48 hours without first
(Specify geographic limits, if any)
having notified this Service office of the dates and places of such proposed travel.
- ☒ That you furnish written notice to this Service office of any change of residence or employment within 48 hours of such change.
- ☒ That you report in person on the 12th day of September 2001 in this Service office at: 26 Federal Plaza
New York, NY
unless you are granted written permission to report on another date.
- ☒ That you assist the Immigration and Naturalization Service in obtaining any necessary travel documents.
- ☐ Other: _____
- ☒ See attached sheet containing other specified conditions (Continue on separate sheet if required)

Theodore R Nordmark
(Signature of INS official)
Theodore R. Nordmark ADD/DDP
(Print name and title of INS official)

Alien's Acknowledgment of Conditions of Release under an Order of Supervision

I hereby acknowledge that I have (read) (had interpreted and explained to me in the _____ language) the contents of this order, a copy of which has been given to me. I understand that failure to comply with the terms of this order may subject me to a fine, detention, or prosecution.

[Signature]
(Signature of INS official serving order)

[Signature]
(Signature of INS alien)

8/29/01
(Date)

Aug 29 01 02:13p

United States

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U.S. Department of Justice
Immigration and Naturalization Service

Order of Supervision-AddendumFile No: A12 355 636Date: August 14, 2001Name: TURPIN, PAUL

☒ That you do not associate with known gang members, criminal associates, or be associated with any such activity.

☒ That you register in a substance abuse program within 14 days and provide the INS with written proof of such within 30 days. The proof must include the name, address, duration, and objectives of the program as well as the name of a program counselor.

☐ That you register in a sexual deviancy counseling program within 14 days and provide the INS with written proof of such within 30 days. You must provide the INS with the name of the program, the address of the program, duration and objectives of the program as well as the name of a counselor.

☐ That you register as a sex offender, if applicable, within 7 days of being released, with the appropriate agency(s) and provide the INS with written proof of such within 10 days.

☒ That you do not commit any crimes while on this Order of Supervision.

☒ That you report to any parole or probation officer as required within 5 business days and provide the INS with written verification of the officers name, address, telephone number, and reporting requirements.

☒ That you continue to follow any prescribed doctors orders whether medical or psychological including taking prescribed medications.

☒ That you provide the INS with written copies of requests to Embassies or Consulates requesting the issuance of a travel document.

☒ That you provide the INS with written responses from the Embassy or Consulate regarding your request.

☒ Any violation of the above conditions will may result in revocation of your employment authorization document.

☒ Any violation of these conditions may result in you being taken into Service custody and you being criminally prosecuted.

☐ Other.

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

PAUL TURPIN, :
Petitioner :
 :
v. : Civil No. 1:CV-01-0168
 : (Judge Rambo)
IMMIGRATION AND NATURALIZATION, :
SERVICE :
Respondent :

CERTIFICATE OF SERVICE BY MAIL

The undersigned hereby certifies that she is an employee in the Office of the United States Attorney for the Middle District of Pennsylvania and is a person of such age and discretion as to be competent to serve papers.

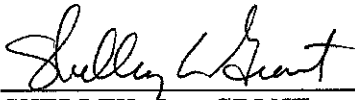
That on August 31, 2001, she served a copy of

NOTICE TO COURT

by placing said copy in a postpaid envelope addressed to the person hereinafter named, at the place and address stated below, which is the last known address, and by depositing said envelope and contents in the United States Mail at Harrisburg, Pennsylvania.

Addressee:

Paul Turpin
53 Chauncey Street
Brooklyn, N.Y. 11233-1709


SHELLEY L. GRANT
Paralegal Specialist